

From: [Carroll, Craig](#)
To: [Mason, Steve](#)
Cc: [R6HarveyRICT](#); [Smith, Monica](#); [Moore, Gary](#)
Subject: Fwd: transition
Date: Friday, September 15, 2017 1:54:50 PM
Attachments: [Texas Orphan transition record Hurricane Harvey Alpha Branch Draft.doc](#)
[ATT00001.htm](#)

Sent from my iPhone

Begin forwarded message:

From: "Moore, Gary" <Moore.Gary@epa.gov>
Date: September 14, 2017 at 9:40:33 PM CDT
To: "Carroll, Craig" <Carroll.Craig@epa.gov>
Cc: "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>, ["anthony.buck@tceq.texas.gov"](mailto:anthony.buck@tceq.texas.gov) <anthony.buck@tceq.texas.gov>
Subject: FW: transition

Craig:

This is the draft transition document that has been prepared for transition of Alpha activities back to the TCEQ Regional Office by EPA/TCEQ in Unified Command. I believe that we should be moving forward with closeout for Alpha Branch for activities associated with the joint EPA/TCEQ Activities. USCG/TGLO will have to determine how they want to transition activities back to TGLO.

I am not sure if you have seen this before but this is the document that we intend to move forward on. We need to discuss. Please have someone in the REOC take a look at this and get back to me as soon as possible.

Thanks

Gary Moore

From: Renae Diguardi [<mailto:Renae.Diguardi@tceq.texas.gov>]

Sent: Thursday, September 14, 2017 1:13 PM

To: Moore, Gary <Moore.Gary@epa.gov>

Subject: transition

Please see attached.

Renae DiGuardi-Yates

Emergency Response Coordinator

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**Hurricane Harvey – Texas Unified Command
Mission Assignment Transition**

**Operational Activity Transition Record
For Orphan Drum and Container Collection and
Spills/Discharges from Facilities in Alpha Branch**

To: Susan Clewis
Region 14 Director
Texas Commission on Environmental Quality

From: Hurricane Harvey Unified Command

Thru: Hurricane Harvey - Texas Unified Command for Emergency Support
Function (ESF) #10

EPA Incident Commander

Date: _____

TCEQ Incident Commander

Date: _____

Action	Assignee(s)	Information
Purpose and Background	Operations Section Chief Branch Director	<p>Mission Assignment (MA):</p> <p>MA4332DR-TX-EPA-03</p> <p>Operational Branch: Alpha</p> <p>Area of Responsibility (AOR)/Counties: Aransas, Bee, Calhoun, De Witt, Goliad, Gonzales, Jackson, Kleberg, Lavaca, Nueces, Refugio, San Patricio, Victoria</p> <p>Operational Category: Assessment, identification, removal and disposal of orphan drums and containers; assessment, identification, abatement, containment, and mitigation of potential or actual discharges/releases from facilities.</p> <p>Authorized Activities: Conduct field operations to remove and dispose of oil and hazardous substances in the form of orphan drums and containers, and conduct field operations to abate, contain, and mitigate potential or actual discharges/releases from facilities.</p> <p>Attachment 1: Mission Assignment and Action Request Forms</p>
Findings	Operations Section Chief Branch Director	<p>Milestones: The Unified Command (UC) conducted response activities to mitigate exposure threats from oil and hazardous substances associated with orphan drums and containers, and potential or actual discharges/releases from facilities. These recovery efforts were focused throughout the affected areas of the Alpha Branch AOR. Some orphan drums and containers were recovered in the incorporated areas while others were associated with the rural and sensitive areas (open water, marsh, and swamp areas) of the County. These orphan drums and containers appeared to have originated from land based businesses, and/or off-shore petroleum operations. All recovery efforts were conducted in such a manner</p>

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		<p>as to avoid or minimize additional damage to the sensitive environments within the Alpha Branch AOR. To this end, prior to beginning recovery operations in an area, both ground and aerial reconnaissance (where applicable) were conducted. The UC was able to gather information on recovery targets, evaluate possible access routes, temporary staging locations (if necessary), determine appropriate equipment needs, and evaluate safety considerations. The UC also assigned unique identifications in its Response Manager database for orphan drum and container targets, and facility spills/discharges.</p> <p>Following the reconnaissance, the UC created tactical maps of all targets located within the Alpha Branch AOR. The UC developed performance guidelines in conjunction with both State and Federal natural resources trustee agencies. The goal of the response effort was to minimize any collateral environmental damage, while mitigating hazardous material threats to public health and environment. When operations were conducted in sensitive habitats, wetlands-experienced personnel documented all activities before, during and after recovery.</p> <p>The UC conducted the following best management practices and conservation measures:</p> <ul style="list-style-type: none"> • Preservation of Existing Habitats: Recovery activities were minimized and focused on the protection of existing vegetation. • Selectivity of Recovery Equipment: Equipment was chosen and employed to avoid or minimize adverse effects to habitat and wildlife. • Spill Prevention: Control and countermeasures were implemented to reduce the risk of spills during recovery operations. <p>A system of grids and zones was created to track collection progress. Upon completion of</p>

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		<p>recovery operations in an area, ground and/or aerial verification was conducted.</p> <p>The UC processed a total of 227 locations through Alpha Branch orphan drum and container operations, and a total of [insert #s] locations through the Alpha Branch facility discharge operations.</p> <p>The UC conducted recovery of orphan drums and containers in Alpha Branch from approximately August 28, 2017 through September __, 2017.</p> <p>Some items were left in place because they were not a hazardous material threat or the contents were emptied and the containers no longer posed a significant public health or environmental risk relative to the likely environmental impact required for removal. Other containers were left in place when owners could be identified and contacted, resulting in the owner performing removal of their items. In addition some containers or spills were referred to other state or local agencies. Containers located on federal land were referred to those agencies which own the land, such as Department of Interior or US Army Corp of Engineer. These items were not addressed under this mission assignment as Federal lands are outside the statutory authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.</p> <p>In Alpha Branch, two (2) items remain open and will require recovery or have been referred to the Responsible Party.</p> <p>The UC conducted abatement and mitigation operations regarding facility discharges/releases in Alpha Branch from approximately August 28, 2017 through September XX, 2017.</p> <p>The UC identified a [insert total number] facilities that were compromised and had a potential or actual discharge/release into the environment. [Insert number] facilities were</p>

Action	Assignee(s)	Information
		<p>closed out by transferring the jurisdiction to the proper state agency. [insert number] were transferred to the TCEQ, [insert number] were transferred to the TGLO, and [insert number] were transferred to the RRC. The state agencies will close out these facilities under their normal business practices.</p> <p>On September XX, 2017, TCEQ indicated they were ready to transition recovery activities from ESF-10 Unified Command back to the state. A final aerial reconnaissance was conducted on September 12, 2017 to verify identified targets had been removed prior to transition.</p> <p>Attachment 2: Alpha Branch Map Showing Recovery Required and Left in Place Orphan Drum and Container Locations by County Attachment 3: Table of Recovery Required and Left in Place Orphan Drums and Containers by County Attachment 4: Chart of Orphan Drum and Container Recovery Totals by Type Attachment 5: Table of Emptied/NonHaz and also Owner Recovered Drums and Containers Left in Place by County Attachment 6: Table of Drums and Containers Referred to an RP or to Another Agency by County Attachment 7: Alpha Branch Map Showing Open Item Facilities Referred to the State Agencies by County Attachment 8: Alpha Branch Table Showing Open Item Facilities Referred to the State Agencies by County</p>
Continuously evaluate operational activities and identify decision point for completion of activity or its transition back to state and/or County.	Operations Section Chief Branch Director	<p>Activity Transition Criteria: Orphaned container collection continued until transitioned to the state. Aside from the targets left open or turned over to the State Agencies and/or Agency contractors, and County contractors all known hazardous material threats were mitigated, but containers that may have sunk, were hidden by debris, or were otherwise unknown to the responders may still be present.</p>

Commented [RD1]: If we add spills/facilities, add attachments to show which were left open, and/or which were referred to different agencies/jurisdictions.

Commented [RD2]: Can we color code them to show which were referred to TCEQ, which to TGLO, and which to RRC?

Action	Assignee(s)	Information
Work with County and State officials to establish a mission transition strategy (including Outreach strategy) and mission completion schedule.	Branch Director	Strategy details and schedule: Unified Command recovered all identifiable targets. Any future containers should be identified and recovered through normal business operations.
Brief Agency contacts on activity completion prior to implementation.	Unified Command	Results: The Unified Command has briefed their respective agency contacts prior to transition.
Concurrently Brief JFO/AFO on activity closeout prior to implementation.	Unified Command	Results: No formal briefing to the JFO/AFO will be required for this activity as each County is closed out.

ATTACHMENT 1
CURRENT FEMA MISSION ASSIGNMENT

ATTACHMENT 2
COUNTY MAP SHOWING RECOVERY REQUIRED AND LEFT IN PLACE
ORPHAN DRUM AND CONTAINER LOCATIONS

ATTACHMENT 3
TABLE OF RECOVERY REQUIRED AND LEFT IN PLACE ORPHAN DRUMS
AND CONTAINERS

ATTACHMENT 4
CHART OF ORPHAN DRUM AND CONTAINER RECOVERY TOTALS BY
TYPE

ATTACHMENT 5
TABLE OF EMPTIED/NONHAZ OR OWNER RECOVERED DRUMS AND
CONTAINERS LEFT IN PLACE

ATTACHMENT 6
TABLE OF DRUMS AND CONTAINERS RECOVERED BY RP OR REFERRED
TO ANOTHER AGENCY

ATTACHMENT 7
Alpha Branch Map Showing Open Item Facilities Referred to the State Agencies by
County

ATTACHMENT 8
Alpha Branch Table Showing Open Item Facilities Referred to the State Agencies
by County